

5-638580
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MAERSK LINE,

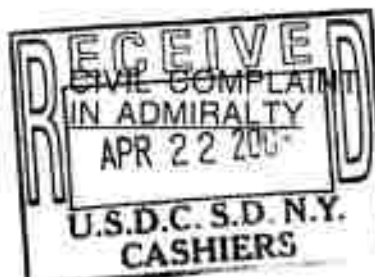
Plaintiff,

- against -

TARGET INTERNATIONAL SHIPPING,
INC.,

Defendant.
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08 CIV 38167



Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES, as and for its Complaint against defendant TARGET INTERNATIONAL SHIPPING, INC., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of 1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 26 of the Bills of Lading.
2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and still is a corporation duly organized and existing under the laws of the State of Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte, NC 28209.
3. Upon information and belief and at all times hereinafter mentioned, defendant had and now has the legal status and place of business as set forth in Schedule A.
4. On or about the dates and at the ports of shipment stated in Schedule A, certain goods were delivered to plaintiff to be carried to the ports of destination and at the agreed charges to be paid by defendant pursuant to plaintiff's published tariff, all as set forth in Schedule A.
5. Thereafter, the goods were carried to the ports of destination and delivered to the consignee and/or its agents.

7. Defendant has failed and refused and continues to fail and refuse to remit payment of \$285,968.67, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$285,968.67 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendants citing them to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York
April 22, 2008

LAW OFFICES OF
ALBERT J. AVALLONE & ASSOCIATES

By


Albert J. Avallone - AA1679
Attorneys for Plaintiff
MAERSK LINE
551 Fifth Avenue, Suite 1625
New York, NY 10176
(212) 696-1760

I. Defendant's status & address:

A. Upon information and belief and at all times hereinafter mentioned, defendant TARGET INTERNATIONAL SHIPPING, INC. was and still is a corporation organized and existing under the laws of the State of New Jersey, with offices and a place of business at 1540 West Blancke St., Linden, NJ 07036.

II. Details of shipment(s):

1. Bill of Lading No. 22877791, dated May 2, 2007, from Salt Lake City to Beira via Newark on the Vessel SANTA ADRIANA, one (1) forty-foot container SAID TO CONTAIN: USED MIXED SHOES, at the applicable tariff and/or Service Contract rate of \$10,875.80 (Exhibit A).

Amount Paid: \$6,490.80

Amount Due: \$4,385.00

2. Bill of Lading No. 523000066, dated May 6, 2007, from Newark to Luanda on the Vessel PACIFIC DENVER, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, et al., at the applicable tariff and/or Service Contract rate of \$5,501.00 (Exhibit B).

Amount Paid: \$0

Amount Due: \$5,501.00

3. Bill of Lading No. 522979299, dated May 7, 2007, from Boston to Durban on the Vessel MSC NILGUN, one (1) twenty-foot container SAID TO CONTAIN: HOUSEHOLD GOODS & PERSONAL EFFECTS, at the applicable tariff and/or Service Contract rate of \$2,636.00 (Exhibit C).

Amount Paid: \$0

Amount Due: \$2,636.00

CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$5,565.00 (Exhibit D).

Amount Paid: \$0

Amount Due: \$5,565.00

5. Bill of Lading No. 523505913, dated July 15, 2007, from Newark to
Pointe Noire on the Vessel MAERSK DORTMUND, one (1) twenty-foot container
SAID TO CONTAIN: USED SHOES, at the applicable tariff and/or Service
Contract rate of \$2,618.00 (Exhibit E).

Amount Paid: \$0

Amount Due: \$2,618.00

6. Bill of Lading No. 523428157, dated July 20, 2007, from Baltimore to
Apapa via Norfolk on the Vessel MAERSK DOUALA, one (1) forty-foot container
SAID TO CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate
of \$3,824.15 (Exhibit F).

Amount Paid: \$0

Amount Due: \$3,824.15

7. Bill of Lading No. 523735598, dated September 1, 2007, from Newark
to Luanda on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID
TO CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate of
\$4,165.00 (Exhibit G).

Amount Paid: \$0

Amount Due: \$4,165.00

container SAID TO CONTAIN: 3 CARS, at the applicable tariff and/or Service
Contract rate of \$4,372.47 for Inland Haul (Exhibit H).

Amount Paid: \$0

Amount Due: \$4,372.00

9. Bill of Lading No. 523810138, dated November 14, 2007, from Newark
to Luanda on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID
TO CONTAIN: 3 CARS, at the applicable tariff and/or Service Contract rate of
\$1,200.00 (Exhibit I).

Amount Paid: \$0

Amount Due: \$1,200.00

10. Bill of Lading No. 523575657, dated December 28, 2007, from Ontario
to Zanzibar via Los Angeles on the Vessel MAERSK KLAIPEDA, one (1) twenty-
foot container SAID TO CONTAIN: TOILETTE PREPARATIONS. Duala Port
Additional of \$600.00 (Exhibit J).

Amount Paid: \$0

Amount Due: \$600.00

11. Bill of Lading No. 523810142, dated September 9, 2007, from Newark
to Luanda on the Vessel MAERSK DORTMUND, one (1) forty-foot container
SAID TO CONTAIN: 3 CARS, at the applicable tariff and/or Service Contract rate
of \$5,55.00 (Exhibit K).

Amount Paid: \$0

Amount Due: \$5,565.00

Baltimore to Apapa via Norfolk on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, Destination THC charge of \$452.94 (Exhibit L).

Amount Paid: \$0

Amount Due: \$452.94

13. Bill of Lading No. 523927564, dated September 28, 2007, from Baltimore to Luanda via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot container SAID TO CONTAIN: USED COMPUTERS, Import Port Dues of \$1,200.00 (Exhibit M).

Amount Paid: \$0

Amount Due: \$1,200.00

14. Bill of Lading No. 523859704, dated September 26, 2007, from Newark to Luanda on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, Import Port Dues of \$1,200.00 (Exhibit N).

Amount Paid: \$0

Amount Due: \$1,200.00

15. Bill of Lading No. 523928388, dated October 6, 2007, from Newark to Luanda on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, Import Port dues of \$1,200.00 (Exhibit O).

Amount Paid: \$0

Amount Due: \$1,200.00

CONTAIN: 3 CARS, Import Port Dues of \$1,200.00 (exhibit P).

Amount Paid: \$0

Amount Due: \$1,200.00

17. Bill of Lading No. 523928389, dated October 7, 2007, from Newark to
Luanda on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID TO
CONTAIN: 3 CARS, Import Port Dues of \$1,200.00 (Exhibit Q).

Amount Paid: \$0

Amount Due: \$1,200.00

18. Bill of Lading No. 524053079, dated October 7, 2007, from Newark to
Luanda on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID TO
CONTAIN: 4 CARS, Import Port Dues of \$1,200.00 (Exhibit R).

Amount Paid: \$0

Amount Due: \$1,200.00

19. Bill of Lading No. 524147585, dated October 12, 2007, from Freetown
to Newark on the Vessel ODR TRADER, one (1) forty-foot container SAID TO
CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate of
\$5,911.00 (Exhibit S), and EQU. EXAMINATION of \$339.80 (Exhibit T).

Amount Paid: \$6,250.00

Amount Due: \$6,250.80

20. Bill of Lading No. 524160064, dated October 12, 2007, from Freetown
to Newark on the Vessel ODER TRADER, one (1) forty-foot container SAID TO
CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$5,911.00 (Exhibit U).

Amount Paid: \$0

Amount Due: \$5,911.00

CONTAIN: 3 CARS, Destination Document Fee, Import Fee, and Import Port
Dues of \$1,275.00 (Exhibit V).

Amount Paid: \$0

Amount Due: \$1,275.00

22. Bill of Lading No. 523928387, dated October 21, 2007, from Newark to
Luanda on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO

CONTAIN: 3 CARS, Import Port Dues of \$1,200.00 (Exhibit W).

Amount Paid: \$0

Amount Due: \$1,200.00

23. Bill of Lading No. 855285823, dated October 21, 2007, from Newark to
Apapa on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO

CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$3,691.00 (Exhibit X).

Amount Paid: \$2,471.00

Amount Due: \$1,220.00

24. Bill of Lading No. 524121841, dated October 23, 2007, from Monrovia
to Freetown on the Vessel TROENSE MAERSK, one (1) forty-foot container SAID

TO CONTAIN: 1 CAR, et al., at the Basic Freight of \$2,600.00 (Exhibit Y), and
additional charges of \$418.25 (Exhibit Z), totalling \$3,018.25.

Amount Paid: \$0

Amount Due: \$3,018.25

CONTAIN: 2 CARS, Destination Document Fees and Import Port Dues of
\$250.00 (Exhibit 2A).

Amount Paid: \$0

Amount Due: \$250.00

26. Bill of Lading No. 524163483, dated November 20, 2007, from Newark
to Dakar on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID
TO CONTAIN: 2 CARS, at the applicable tariff and/or Service Contract rate of
\$9,428.28 (Exhibit 2B).

Amount Paid: \$4,681.00

Amount Due: \$4,747.28

27. Bill of Lading No. 524374071, dated December 11, 2007, from Newark
to Apapa on the Vessel MAERSK DAESAN, one (1) forty-foot container SAID
TO CONTAIN: 1 CAR, et al., Destination THC of \$310.03 (Exhibit 2C).

Amount Paid: \$0

Amount Due: \$310.03

28. Bill of Lading No. 524511302, dated December 11, 2007, from Newark
to Monrovia on the Vessel MAERSK DAESAN, one (1) forty-foot container SAID
TO CONTAIN: HOUSEHOLD GOODS & PERSONAL EFFECTS, Import Port
Dues of \$500.00 (Exhibit 2D).

Amount Paid: \$0

Amount Due: \$500.00

29. Bill of Lading No. 524375688, dated December 19, 2007, from Savannah to Tin Can Island on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service Contract rate of \$3,216.00 (Exhibit 2E), and Import Port Dues of \$100.00 (Exhibit 2F) for a total due of \$3,316.00.

Amount Paid: \$2,366.00

Amount Due: \$950.00

30. Bill of Lading No. 524541251, dated December 21, 2007, from Baltimore to Luanda via Norfolk on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO CONTAIN: USED SHOES, et al., Import Port Dues of \$800.00 (Exhibit 2G).

Amount Paid: \$0

Amount Due: \$800.00

31. Bill of Lading No. 524550879, dated December 21, 2007, from Baltimore to Apapa via Norfolk on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO CONTAIN: 3 CARS, et al., Destination THC of \$501.92 (Exhibit 2H).

Amount Paid: \$0

Amount Due: \$501.92

32. Bill of Lading No. 524678772, dated december 22, 2007, from Newark to Monrovia on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO CONTAIN: SHEET METAL, et al., at the applicable tariff and/or Service Contract rate of \$3,066.00 (Exhibit 2I).

Amount Paid: \$2,816.00

Amount Due: \$250.00

33. Bill of Lading No. 524558493, dated January 16, 2008, from Chicago to
Ohne via Norfolk on Vessel MAERSK DOUALA, one (1) forty-foot container SAID
TO CONTAIN: 1 USED CATERPILLAR, at the applicable tariff and/or Service
Contract rate of \$4,736.00 (Exhibit 2J).

Amount Paid: \$0

Amount Due: \$4,736.00

34. Bill of Lading No. 524559333, dated January 10, 2008, from Savannah
to Tin Can Island on the Vessel MAERSK DUISBURG, one (1) forty-foot container
SAID TO CONTAIN: 3 CARS, at the applicable tariff and/or Service Contract rate
of \$4,986.00 (Exhibit 2K).

Amount Paid: \$3,366.00

Amount Due: \$1,620.00

35. Bill of Lading No. 524131601, dated January 14, 2008, from Baltimore
to Monrovia via Norfolk on the Vessel AGNETE MAERSK, one (1) forty-foot
container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or
Service Contract rate of \$7,656.00 (Exhibit 2L).

Amount Paid: \$0

Amount Due: \$7,656.00

36. Bill of Lading No. 524809832, dated January 28, 2008, from New York
to Conakry on the Vessel MAERSK DOUGLAS, one (1) twenty-foot container
SAID TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or
Service Contract rate of \$2,631.00 (Exhibit 2M).

Amount Paid: \$0

Amount due: \$2,631.00

TO CONTAIN: TOILETTE PREPARATION, at the applicable tariff and/or Service
Contract rate of \$2,706.00 (Exhibit 2N).

Amount Paid: \$0

Amount Due: \$2,706.00

38. Bill of Lading No. 524923299, dated February 6, 2008, from Savannah
to Orne on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO
CONTAIN: FURNITURE UPHOLSTERY FABRICS, at the applicable tariff and/or
Service Contract rate of \$4,081.00 (Exhibit 2Q).

Amount Paid: \$0

Amount Due: \$4,081.00

39. Bill of Lading No. 524810393, dated February 7, 2008, from Savannah
to Maladi on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO
CONTAIN: USED CLOTHING, at the applicable tariff and/or Service Contract rate
of \$5,081.00 (Exhibit 2P).

Amount Paid: \$0

Amount Due: \$5,081.00

40. Bill of Lading No. 524624365, dated February 13, 2008, from Norfolk to
Freetown on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID
TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or Service Contract rate
of \$4,661.00 (Exhibit 2Q).

Amount Paid: \$4,561.00

Amount Due: \$100.00

41. Bill of Lading No. 524972450, dated February 13, 2008, from Newark to Freetown on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of \$4,900.80 (Exhibit 2R).

Amount Paid: \$4,511.00

Amount Due: \$339.80

42. Bill of Lading No. 524614591, dated February 15, 2008, from Columbus to Freetown via Norfolk, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate of \$5,571.00 (Exhibit 2S).

Amount Paid: \$4,661.00

Amount Due: \$910.00

43. Bill of Lading No. 855938931, dated February 17, 2008, from New York to Monrovia on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO CONTAIN: SHOES, et al., at the applicable tariff and/or Service Contract rate of \$4,451.00 (Exhibit 2T).

Amount Paid: \$3,951.00

Amount Due: \$500.00

44. Bill of Lading No. 524980019, dated February 22, 2008, from Fontana to Zanzibar via Los Angeles on the Vessel MAERSK BUFFALO, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATONS, at the applicable tariff and/or Service Contract rate of \$3,434.00 (Exhibit 2U).

Amount Paid: \$0

Amount Due: \$3,434.00

45. Bill of Lading No. 524980090, dated February 22, 2008, from Newark to Monrovia on the Vessel MAERSK DORTMUND, one (1) forty-foot container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of \$4,051.00 (Exhibit 2V).

Amount Paid: \$4,051.00

Amount Due: \$400.00

46. Bill of Lading No. 525048028, dated February 28, 2008, from Savannah to Monrovia on the Vessel MAERSK DOUALA, one (1) forty-foot container SAID TO CONTAIN: USED CLOTHING, at the applicable tariff and/or Service Contract rate of \$4,451.00 (Exhibit 2W).

Amount Paid: \$3,951.00

Amount Due: \$500.00

47. Bill of Lading No. 524942724, dated March 1, 2008, from Chicago to Cotonou via Newark on the Vessel MAERSK DOUALA, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATION, at the applicable tariff and/or Service Contract rate of \$3,721.00 (Exhibit 2X).

Amount Paid: \$0

Amount Due: \$3,721.00

48. Bill of Lading No. 524959393, dated March 1, 2008, from Newark to Douala on the Vessel MAERSK DOUALA, one (1) forty-foot container SAID TO CONTAIN: 2 CARS, at the applicable tariff and/or Service Contract rate of \$4,681.00 (Exhibit 2Y).

Amount Paid: \$4,381.00

Amount Due: \$300.00

SAID TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or Service Contract
rate of \$4,941.00 (Exhibit 2Z).

Amount Paid: \$0

Amount Due: \$4,941.00

50. Bill of Lading No. 525013373, dated March 1, 2008, from Baltimore to
Tin Can Island via Norfolk on the Vessel MAERSK DOUALA, one (1) twenty-foot
container SAID TO CONTAIN: TRACTORS, et al., at the applicable tariff and/or
Service Contract rate of \$3,136.00 (Exhibit 3A).

Amount paid: \$0

Amount Due: \$3,136.00

51. Bill of Lading No. 525036704, dated March 1, 2008, from Baltimore to
Banjul via Norfolk on the Vessel MAERSK DOUALA, one (1) forty-foot container
SAID TO CONTAIN: PERSONAL EFFECTS, at the applicable tariff and/or
Service Contract rate of \$4,921.00 (Exhibit 3B).

Amount Paid: \$4,561.00

Amount Due: \$360.00

52. Bill of Lading No. 525046796, dated March 3, 2008, from Newark to
Conakry on the Vessel MAERSK DOUALA, one (1) forty-foot container SAID TO
CONTAIN: USED CLOTHES & SHOES, at the applicable tariff and/or Service
Contract rate of \$4,601.00 (Exhibit 3C).

Amount Paid: \$4,381.00

Amount Due: \$220.00

CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$4,601.00 (Exhibit 3D).

Amount Paid: \$4,381.00

Amount Due: \$220.00

54. Bill of Lading No. 525126785, dated March 7, 2008, from Chicago to
Norfolk via Onne on the Vessel MAERSK DUISBURG, one (1) twenty-foot
container SAID TO CONTAIN: VINYL SCRAPS, at the applicable tariff and/or
Service Contract rate of \$3,446.00 (Exhibit 3E).

Amount Paid: \$3,281.00

Amount Due: \$165.00

55. Bill of Lading No. 525125823, dated March 9, 2008, from New York to
Freetown on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID
TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or Service Contract rate
of \$4,761.00 (Exhibit 3F).

Amount Paid: \$4,561.00

Amount Due: \$200.00

56. Bill of Lading No. 856049615, dated March 11, 2008, from New York to
Freetown on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID
TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate
of \$4,561.00 (Exhibit 3G).

Amount Paid: \$0

Amount Due: \$4,561.00

SAID TO CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate
of \$4,956.00 (Exhibit 3H).

Amount Paid: \$4,056.00

Amount Due: \$900.00

58. Bill of Lading No. 525085031, dated March 11, 2008, from Savannah to
Tin Can Island on the Vessel MAERSK DJIBOUTI, one (1) forty-foot container

SAID TO CONTAIN: 3 CARS, at the applicable tariff and/or Service Contract rate
of \$4,756.00 (Exhibit 3I).

Amount Paid: \$0

Amount Due: \$4,756.00

59. Bill of Lading No. 525095916, dated March 11, 2008, from Newark to
Mombasa on the Vessel MAERSK DUISBURG, one (1) forty-foot container SAID
TO CONTAIN: USED PERSONAL EFFECTS, at the applicable tariff and/or
Service Contract rate of \$3,416.00 (Exhibit 3J).

Amount Paid: \$0

Amount Due: \$3,416.00

60. Bill of Lading No. 524911671, dated March 13, 2008, from Baltimore to
Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot
container SAID TO CONTAIN: 4 CARS, et al., at the applicable tariff and/or
Service Contract rate of \$4,921.00 (Exhibit 3K).

Amount Paid: \$4,561.00

Amount Due: \$360.00

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot

container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or

Service Contract rate of \$4,921.00 (Exhibit 3L).

Amount Paid: \$4,561.00

Amount Due: \$360.00

62. Bill of Lading No. 525012277, dated March 15, 2008, from Baltimore to

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) twenty-foot

container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service

Contract rate of \$2,971.00 (Exhibit 3M).

Amount Paid: \$2,701.00

Amount Due: \$270.00

63. Bill of Lading No. 525068119, dated March 15, 2008, from Baltimore to

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot

container SAID TO CONTAIN: 3 CARS, at the applicable tariff and/or Service

Contract rate of \$4,921.00 (Exhibit 3N).

Amount Paid: \$4,561.00

Amount Due: \$360.00

64. Bill of Lading No. 525075187, dated March 15, 2008, from Baltimore to

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) twenty-foot

container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service

Contract rate of \$2,971.00 (Exhibit 3O).

Amount Paid: \$2,701.00

Amount Due: \$270.00

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot

container SAID TO CONTAIN: 4 CARS, et al., at the applicable tariff and/or

Service Contract rate of \$4,921.00 (Exhibit 3P).

Amount Paid: \$0

Amount Due: \$4,921.00

66. Bill of Lading No. 525126736, dated March 15, 2008, from Baltimore to

Freetown via Norfolk on the Vessel MAERSK DJIBOUTI, one (1) forty-foot

container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service

Contract rate of \$4,921.00 (Exhibit 3Q).

Amount Paid: \$0

Amount Due: \$360.00

67. Bill of Lading No. 525156695, dated March 15, 2008, from Newark to

Onne on the Vessel MAERSK DJIBOUTI, one (1) twenty-foot container SAID TO

CONTAIN: VYNILE GRADE "C", at the applicable tariff and/or Service Contract

rate of \$3,016.00 (Exhibit 3R).

Amount Paid: \$0

Amount due: \$3,016.00

68. Bill of Lading No. 856105369, dated March 15, 2008, from Newark to

Cotonou on the Vessel MAERSK DJIBOUTI, one (1) twenty-foot container SAID

TO CONTAIN: TOILETTE PREPARATION, at the applicable tariff and/or Service

Contract rate of \$2,836.00 (Exhibit 3S).

Amount Paid: \$0

Amount Due: \$2,836.00

Cotonou on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID
TO CONTAIN: USED SHOES, et al., at the applicable tariff and/or Service
Contract rate of \$5,011.00 (Exhibit 3V).

Amount Paid: \$0

Amount Due: \$5,011.00

70. Bill of Lading No. 525175695, dated March 18, 2008, from New York to
Freetown on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID
TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate
of \$4,761.00 (Exhibit 3U).

Amount Paid: \$4,561.00

Amount Due: \$200.00

71. Bill of Lading No. 525174144, dated March 18, 2008, from Chicago to
Cotonou via Newark on the Vessel MAERSK DOUGLAS, one (1) twenty-foot
container SAID TO CONTAIN: TOILET PREPARATION, at the applicable tariff
and/or Service Contract rate of \$3,721.00 (Exhibit 3V).

Amount Paid: \$0

Amount Due: \$3,721.00

72. Bill of Lading No. 856113352, dated March 20, 2008, from Newark to
Freetown on the Vessel MAERSK DAESAN, one (1) forty-foot container SAID TO
CONTAIN: 2 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$4,761.00 (Exhibit 3W).

Amount Paid: \$0

Amount Due: \$4,761.00

73. Bill of Lading No. 525047951, dated March 20, 2008, from Baltimore to Freetown via Norfolk on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, at the applicable tariff and/or Service Contract rate of \$4,921.00 (Exhibit 3X).

Amount Paid: \$4,561.00

Amount Due: \$360.00

74. Bill of Lading No. 525177874, dated March 23, 2008, from Savannah to Onne on the Vessel MAERSK DOUGLAS, one (1) forty-foot container SAID TO CONTAIN: POCKETING STOCK LOTS, at the applicable tariff and/or Service Contract rate of \$4,381.00 (Exhibit 3Y).

Amount Paid: \$0

Amount Due: \$4,381.00

75. Bill of Lading No. 525204731, dated March 27, 2008, from New York to Dakar on the Vessel MAERSK DAESAN, one (1) forty-foot container SAID TO CONTAIN: TOILETTE PREPARATIONS, et al., at the applicable tariff and/or Service Contract rate of \$4,746.00 (Exhibit 3Z).

Amount Paid: \$0

Amount Due: \$4,746.00

76. Bill of Lading No. 858173006, dated March 27, 2008, from Newark to Cotonou on the Vessel MAERSK DAESAN, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or Service Contract rate of \$3,311.00 (Exhibit 4A).

Amount Paid: \$0

Amount Due: \$3,311.00

TO CONTAIN: USED COMPUTERS, at the applicable tariff and/or Service

Contract rate of \$2,521.00 (Exhibit 4B).

Amount Paid: \$0

Amount Due: \$2,521.00

78. Bill of Lading No. 525156711, dated March 29, 2008, from Baltimore to
Banjul via Norfolk on the Vessel MAERSK DAESAN, one (1) forty-foot container
SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service Contract
rate of \$4,921.00 (Exhibit 4C).

Amount Paid: \$0

Amount Due: \$4,921.00

79. Bill of Lading No. 525193706, dated March 29, 2008, from Baltimore to
Onne via Norfolk on the Vessel MAERSK DAESAN, one (1) forty-foot container
SAID TO CONTAIN: POCKETING STOCK LOTS, at the applicable tariff and/or
Service Contract rate of \$4,651.00 (Exhibit 4D).

Amount Paid: \$0

Amount Due: \$4,651.00

80. Bill of Lading No. 524131601, dated January 14, 2008, from Monrovia
to Norfolk on the Vessel AGNETE MAERSK, one (1) forty-foot container SAID TO
CONTAIN: 3 CARS, et al., at the applicable tariff collect charges of \$278.00
(Exhibit 4E).

Amount Paid: \$0

Amount Due: \$278.00

SAID TO CONTAIN: RAW MATERIALS, et. al., tax and telex release charge of
\$3.95 (Exhibit 4F).

Amount Paid: \$0

Amount Due: \$5.95

82. Bill of Lading No. 525193927, dated March 30, 2008, from Savannah to
Onne on the Vessel MAERSK DAESAN, one (1) twenty-foot container SAID TO
CONTAIN: MUTILATED RAGS, at the applicable tariff and/or Service Contract
rate of \$2,916.00 (Exhibit 4G).

Amount Paid: \$0

Amount Due: \$2,916.00

83. Bill of Lading No. 525126719, dated April 1, 2008, from Newark to
Banjul on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO
CONTAIN: 3 CARS, et. al., at the applicable tariff and/or Service Contract rate of
\$4,561.00 (Exhibit 4H).

Amount Paid: \$0

Amount Due: \$4,561.00

84. Bill of Lading No. 525125516, dated April 1, 2008, from New York to
Freetown on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO
CONTAIN: 1 CAR, et. al., at the applicable tariff and/or Service Contract rate of
\$4,561.00 (Exhibit 4I).

Amount Paid: \$0

Amount Due: \$4,561.00

85. Bill of Lading No. 525207289, dated April 4, 2008, from Houston to Onne on the Vessel MAERSK MADRID, one (1) twenty-foot container SAID TO CONTAIN: PVS SCRAPS, at the applicable tariff and/or Service Contract rate of \$2,916.00 (Exhibit 4J).

Amount Paid: \$0

Amount Due: \$2,916.00

86. Bill of Lading No. 525225230, dated April 1, 2008, from New York to Conakry on the Vessel MAERSK DENVER, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATION, at the applicable tariff and/or Service Contract rate of \$2,521.00 (Exhibit 4K).

Amount Paid: \$0

Amount Due: \$2,521.00

87. Bill of Lading No. 525243644, dated April 1, 2008, from Newark to Cotonou on the Vessel MAERSK DENVER, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or Service Contract rate of \$2,836.00 (Exhibit 4L).

Amount Paid: \$0

Amount Due: \$2,836.00

88. Bill of Lading No. 525224505, dated April 3, 2008, from Baltimore to Banjul via Norfolk on the Vessel MAERSK DENVER, one (1) forty-foot container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service Contract rate of \$4,921.00 (Exhibit 4M).

Amount Paid: \$0

Amount Due: \$4,921.00

container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or
Service Contract rate of \$5,121.00 (Exhibit 4N).

Amount Paid: \$0

Amount Due: \$5,121.00

90. Bill of Lading No. 525234876, dated April 6, 2008, from Baltimore to
Freetown via Norfolk on the Vessel MAERSK DENVER, one (1) forty-foot
container SAID TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or
Service Contract rate of \$5,121.00 (Exhibit 4O).

Amount Paid: \$0

Amount Due: \$5,121.00

91. Bill of Lading 525248227, dated April 8, 2008, from New York to
Freetown on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID
TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or Service Contract rate
of \$4,561.00 (Exhibit 4P).

Amount Paid: \$0

Amount Due: \$4,561.00

92. Bill of Lading No. 854225906, dated April 10, 2008, from Newark to
Banjul on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO
CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of
\$4,561.00 (Exhibit 4Q).

Amount Paid: \$0

Amount Due: \$4,561.00

Cotonou on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID

TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or

Service Contract rate of \$2,836.00 (Exhibit 4R).

Amount Paid: \$0

Amount Due: \$2,836.00

94. Bill of Lading No. 525235789, dated April 10, 2008, from Baltimore to

Freetown via Norfolk on the Vessel MAERSK DUNEDIN, one (1) forty-foot

container SAID TO CONTAIN: 2 CARS, et al., at the applicable tariff and/or

Service Contract rate of \$4,921.00 (Exhibit 4S).

Amount Paid: \$0

Amount Due: \$4,921.00

95. Bill of Lading No. 525195450, dated April 10, 2008, from Baltimore to

Tin Can Island via Norfolk on the Vessel MAERSK DUNEDIN, one (1) forty-foot

container SAID TO CONTAIN: 4 CARS, at the applicable tariff and/or Service

Contract rate of \$4,526.00 (Exhibit 4T).

Amount Paid: \$0

Amount Due: \$4,526.00

96. Bill of Lading No. 525246572, dated April 10, 2008, from New York to

Tema on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO

CONTAIN: SUPERMARKET ITEMS, at the applicable tariff and/or Service

Contract rate of \$2,631.00 (Exhibit 4U).

Amount Paid: \$0

Amount Due: \$2,631.00

container SAID TO CONTAIN: 1 CAR, et al., at the applicable tariff and/or Service
Contract rate of \$4,921.00 (Exhibit 4V).

Amount Paid: \$0

Amount Due: \$4,921.00

98. Bill of Lading No. 525236672, dated April 10, 2008, from New York to
Onne on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO
CONTAIN: VINYL GRADE "C", at the applicable tariff and/or Service Contract rate
of \$2,866.00 (Exhibit 4W).

Amount Paid: \$0

Amount Due: \$2,866.00

99. Bill of Lading No. 525236671, dated April 10, 2008, from New York to
Onne on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO
CONTAIN: VINYL GRADE "C", at the applicable tariff and/or Service Contract rate
of \$2,866.00 (Exhibit 4X).

Amount Paid: \$0

Amount Due: \$2,866.00

100. Bill of Lading No. 525245837, dated May 10, 2008, from New York to
Dakar on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO
CONTAIN: FIBERBOARD CARTONS, at the applicable tariff and/or Service
Contract rate of \$2,766.00 (Exhibit 4Y).

Amount Paid: \$0

Amount Due: \$2,766.00

101. Bill of Lading No. 525246566, dated April 10, 2008, from Newark to Tema on the Vessel MAERSK DUNEDIN, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or Service Contract rate of \$2,631.00 (Exhibit 4Z).

Amount Paid: \$0 Amount Due: \$2,631.00

102. Bill of Lading No. 525277550, dated April 10, 2008, from New York to Banjul on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of \$4,561.00 (Exhibit 5A).

Amount Paid: \$0 Amount Due: \$4,561.00

103. Bill of Lading No. 525300863, dated April 12, 2008, from Norfolk to Tema on the Vessel MAERSK DUNEDIN, one (1) forty-foot container SAID TO CONTAIN: 4 CARS, et al., at the applicable tariff and/or Service Contract rate of \$4,641.00 (Exhibit 5B).

Amount Paid: \$0 Amount Due: \$4,641.00

104. Bill of Lading No. 525329896, dated April 14, 2008, from Los Angeles to Monrovia on the Vessel MAERSK FLORENCE, one (1) forty-foot container SAID TO CONTAIN: USED RAGS CLOTHING, at the applicable tariff and/or Service Contract rate of \$4,761.00 (Exhibit 5C).

Amount Paid: \$0 Amount Due: \$4,761.00

Contract rate of \$2,866.00 (Exhibit 5D).

Amount Paid: \$2,766.00

Amount Due: \$100.00

106. Bill of Lading No. 525021051, dated February 17, 2008, from Newark
to Onne on the Vessel MAERSK DUNEDIN, at the applicable tariff and/or Service
Contract rate of \$2,866.00 (Exhibit 5E).

Amount Paid: \$2,766.00

Amount Due: \$100.00

107. Bill of Lading No. 525013355, dated March 1, 2008, from Chicago to
Onne on the Vessel MAERSK DOUALA, at the applicable tariff and/or Service
Contract rate of \$6,892.00 (Exhibit 5F).

Amount Paid: \$6,562.00

Amount Due: \$330.00

108. Bill of Lading No. 856025932, dated March 3, 2008, from Newark to
Bamako on the Vessel MAERSK DOUALA, at the applicable tariff and/or Service
Contract rate of \$9,441.55 (Exhibit 5G).

Amount Paid: \$4,626.00

Amount Due: \$4,815.55

109. Bill of Lading No. 525143339, dated March 11, 2008, from Newark to
Tin Can Island on the Vessel MAERSK DUISBERG, at the applicable tariff and/or
Service Contract rate of \$2,896.00 (Exhibit 5H).

Amount Paid: \$2,796.00

Amount Due: \$100.00

110. Bill of Lading No. 525175695, dated March 20, 2008, from Newark to Freetown on the Vessel MAERSK DOUGLAS, at the applicable tariff and/or Service Contract rate of \$4,761.00 (Exhibit 5I).

Amount Paid: \$4,561.00

Amount Due: \$200.00

111. Bill of Lading No. 856138246, dated March 27, 2008, from Newark to Freetown on the Vessel MAERSK DAESAN, at the applicable tariff and/or Service Contract rate of \$2,801.00 (Exhibit 5J).

Amount paid: \$2,701.00

Amount Due: \$100.00

112. Bill of Lading No. 525192771, dated March 25, 2008, from Newark to Tin Can Island on the Vessel MAERSK DAESAN, one (1) forty-foot container SAID TO CONTAIN: 3 CARS, et al., at the applicable tariff and/or Service Contract rate of \$4,031.00 (Exhibit 5K).

Amount Paid: \$0

Amount Due: \$4,031.00

113. Bill of Lading No. 525156755, dated March 13, 2008, from Newark to Conakry on the Vessel MAERSK DJIBOUTI, one (1) twenty-foot container SAID TO CONTAIN: TOILETTE PREPARATIONS, at the applicable tariff and/or Service Contract rate of \$2,631.00 (Exhibit 5L).

Amount Paid: \$2,521.00

Amount Due: \$110.00

III. Total Amount Due: \$285,968.67